

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BERKLEY ASSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:21-CV-05303
)	Honorable Joan B. Gottschall
ASSOCIATED INDUSTRIES)	
INSURANCE COMPANY, INC.,)	
)	
Defendants.)	

**AGREED MOTION FOR PROPOSED BRIEFING SCHEDULE AS TO PLAINTIFF’S
RENEWED MOTION FOR JUDGMENT ON THE PLEADINGS AND ANY
CROSS-MOTION**

Plaintiff Berkley Assurance Company (“Berkley”) and Defendant Associated Industries Insurance Company, Inc. (“Associated”) (collectively, the “Parties”), by and through their respective counsel, file this Agreed Motion for Proposed Briefing Schedule (“Motion”) relating to Plaintiff’s Renewed Motion for Judgment on the Pleadings [Doc. 050] (“Renewed Motion”) in the above-styled case and Associated’s anticipated cross-motion, stating as follows:

Counsel for Plaintiff and Defendant have conferred regarding the Motion and any forthcoming cross-motion and agree to the Court entering an order allowing Defendant to file and serve a response to the Renewed Motion and any cross-motion on or before November 15, 2022. Plaintiff shall be allowed to file its reply in support of its Renewed Motion and a response to any cross-motion on or before December 5, 2022. Further, Defendant shall be allowed to file a reply in support of any cross-motion on or before December 20, 2022.

WHEREFORE, Plaintiff Berkley Assurance Company and Defendant Associated Industries Insurance Company, Inc. pray that this Court enter an Order granting this Motion,

enter the proposed briefing schedule deadlines as outlined above, and provide such other and further relief as this Court deems just and proper.

Dated this 20th day of October, 2022.

Respectfully submitted,

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Respectfully submitted,

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